

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:	: Chapter 11
	:
LEHMAN BROTHERS HOLDINGS INC., et al.,	: Case No. 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
	:
	:
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**NOTICE OF INTENT TO PARTICIPATE IN  
DISCOVERY RELATED TO PLAN CONFIRMATION**

NOTICE IS HEREBY GIVEN THAT Federal Home Loan Mortgage Corporation (“Freddie Mac”) in Conservatorship,<sup>1</sup> represented by Landman Corsi Ballaine & Ford P.C., has filed Claims Numbers 33568, 33569 and 33576 against Lehman Brothers Holdings Inc. in the amount of \$2,088,080,962.33 and against Lehman Brothers Special Financing in the amount of \$17,239,087.33 and is a party of interest in the confirmation of a plan in the above-captioned chapter 11 cases (the “Chapter 11 Cases”) on the basis that Freddie Mac is a large creditor whose claims may be impacted by the provisions of the competing plans.

ACCORDINGLY, PLEASE TAKE FURTHER NOTICE that, subject to any objections by the Debtors or the Statutory Committee of Unsecured Creditors appointed in the Chapter 11 Cases and/or any limitations imposed by the Court, the above-named party in interest, and counsel to each of Freddie Mac and FHFA, intend to participate as follows in Plan Discovery, as defined in the Order Establishing Procedures in Connection with Discovery Related to Plan Confirmation and Other Issues, entered by the Court on April 14, 2011 (Docket No. 16003):

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<sup>1</sup> Federal Housing Financing Agency (“FHFA”) is the Conservator of Freddie Mac pursuant to the Housing and Economic Recovery Act of 2008, 12 U.S.C. § 4501, *et seq.* (2008).

Dated: April 28, 2011

LANDMAN CORSI BALLAINE & FORD P.C.

By: /s/ Sophia Ree  
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**Contact Information for Party In Interest (address, phone and email):**

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\* \* \* \* \*

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**Contact Information for Advisors for Party In Interest (address, phone and email):**

N/A

**Designation of Contact(s) to Receive Any Notice(s) Required Under the Order (address, phone and email):**

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**Group that Participant elects to join (pursuant to Paragraph 3(b) of the Order):**

3(b)(i) – the direct creditors of Lehman Brothers Holdings Inc.<sup>2</sup>

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<sup>2</sup> Freddie Mac holds claims represented by other groups, and reserves its right to assert such claims fully and make requests relating to any chapter 11 issues.